

Environmental Standard Operating Procedure (Approved by Jonathan Auger)

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Title: Painting

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for various paint application methods, including aerosol containers, paint brushes and paint spray guns.

2.0 APPLICATION

This guidance applies to those individuals working with paint aerosols, paintbrushes, and paint spray guns aboard Marine Corps Logistics Base (MCLB) Barstow.

3.0 PROCEDURE

3.1 Discussion:

Paint operations that utilize aerosol containers, paint brushes and HVLP paint spray guns for the purpose of applying paint are potentially a source of hazardous waste and can potentially generate air pollution. Because of this, it is critical that standard operating procedures are followed to ensure that painting applications produce the least harm to human health and the environment.

3.2 Operational Controls:

The following procedures apply for all painting applications:

- a. Use only approved paint and painting products that are on the unit's Hazardous Material Authorization Use List (AUL).
- b. SDSs (Safety Data Sheets) for all paint products being used for painting applications must be available and current.
- c. All hazardous waste containers must be marked on the outside with the name of hazardous substance inside the container.
- d. All hazardous waste containers must be properly closed unless adding or removing waste.
- e. Ensure fire extinguishers are accessible and maintained in adequate number in painting areas.

- f. Do not paint outside of predetermined painting areas.
- g. Do not use paint or painting products near open flames or heat sources.
- h. Keep painting areas free from the accumulation of deposits of combustible residues.
- i. Post “No Smoking” signs where flammable vapors may be expected and in areas where painting application items are stored and in accordance with Command Policy
- j. Keep spill kit nearby.
- k. If there are any specific situations or other concerns not addressed by the procedures for painting applications, contact Environmental Division.

Aerosol Paint Containers:

- a. Remove all caps and tips from paint aerosol containers and dispose of them properly before disposing of container in PGP.
- b. Remove gross contamination from the outside of paint aerosol containers before placing in PGP.
- c. Ensure that all paint waste aerosol containers and residue are collected and taken to the unit process generation point for disposal.
- d. Ensure waste paint aerosol containers and/or residues are stored in properly closed and labeled containers.
- e. Ensure all aerosol containers are kept in a flammable material locker that is operated and maintained in strict accordance with the installation and manufacturer's regulations.
- f. When applying paint using aerosol containers, only do so in a well-ventilated area.

Paint Brushes:

- a. Properly dispose of used paintbrushes per installation regulations.

Paint Spray Guns:

- a. Only use HVLP paint spray guns in installation-approved paint spray booths.
- b. Always comply with Permit to Operate (PTO) paint spray booth conditions.
- c. Bond and ground all containers when transferring flammable liquids from container to paint spray gun container.

- d. Ensure clean up of paint spray guns are done in approved areas.
- e. Ensure paint spray guns are cleaned with approved cleaning agents.
- f. Ensure proper PPE is worn while utilizing paint spray guns.

g. All contractors conducting paint spray operations aboard the installation must submit a Request for Environmental Impact Review (REIR) prior to operation. Contact the Environmental Division for further information.

All Painting Operations:

- a. During clean up; keep all solvent containers closed when not in use.
- b. Ensure all paint cans are kept closed when not in use.
- c. Properly contain and dispose of any spills.
- d. Ensure all use paint containers are kept closed before disposal

3.3 Documentation and Record Keeping:

The following records must be maintained for paint aerosols and paint spray guns:

- a. Inspection and training records.

3.4 Training:

All affected personnel must be trained in this Standard Operating Procedure and the following:

- a. General Environmental Awareness training.
- b. Hazard Communication Training.
- c. PGP Coordinator
- d. PGP Weekly inspection

3.5 Emergency Preparedness and Response Procedures:

Refer to the Integrated Contingency Management Plan (ICMP) for Marine Corps Logistics Base Barstow.

3.6 Inspection and Corrective Action:

The Environmental Compliance Coordinator (ECC) shall designate personnel to perform inspections. The ECC shall ensure deficiencies noted during the inspections are corrected immediately. Inspections shall be conducted monthly. Actions taken to correct each deficiency shall be recorded on the inspection sheet.

4.0 REFERENCES

- 40 CFR 261-262 (Code of Federal Regulations)
- 40 CFR 403
- 29 CFR 1910
- CCR, Titles 8 and 17 (California Code of Regulations)
- Mojave Desert Air Quality Management District (MDAQMD) Rules
- Integrated Contingency Plan (ICP) for Marine Corps Logistics Base Barstow

Painting Applications- Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are SDS's readily available and current?			
2. Are only AUL approved paint products being used?			
3. Are all painting products and painting materials that pose a threat to the environment being stored in their Flammable lockers?			
4. Are all used painting material and products that display hazardous waste characteristics being disposed properly as hazardous or universal waste?			
5. Are "No Smoking" signs posted where flammable vapors may be expected?			
6. Do all thinners or solvents in use have a VOC less than 200 grams per liter?			
7. Are paint, product spills, clean-up materials, and used filters properly contained, disposed of properly?			
8. Are all health and safety considerations for the usage of paint containers being applied?			
9. Are spill kits and fire extinguishers kept nearby?			
10. Are training and inspection records maintained and available for inspection?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____